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January 31, 2024

SO ORDERED:

Via ECF

Hon. Tonianne J. Bongiovanni, M.J.
United States District Court for
The District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street – Room 2020
Trenton, New Jersey 08608



TONIANNE J. BONGIOVANNI
United States Magistrate Judge
Dated: February 1, 2024

Re: Joseph Jingoli & Son, Inc. v. Erica L. Beal
Case No. 3:23-cv-21364

Dear Judge Bongiovanni:

This firm currently represents Defendant Erica L. Beal (“Defendant”) in the above-captioned matter. Today, we have filed a Motion to Withdraw as counsel pursuant to Federal Rule 78 and Local Civil Rule 102, and in accordance with New Jersey R.P.C. 1.16(b).

On January 30, 2024, we received a Text Order from this Court advising that an Answer must be filed by February 7, 2024. In consideration of our Motion and to avoid any prejudice to Defendant, we respectfully request that this Court extend the filing deadline for an Answer or responsive pleading for an additional 30 days to allow Defendant an opportunity to either retain new counsel or appear *pro se*.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ *Benjamin C. Curcio*

Benjamin C. Curcio

BCC/jat

cc: Robert P. Zoller, Esq. (*via E-Mail only*)
Erica L. Beal (*via E-mail only*)